

Serving People with Disabilities through the Workforce Investment Act's One-Stop Career Centers

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Prepared by:

The Urban Institute
Pamela Holcomb

Johns Hopkins University
Burt S. Barnow

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Executive Summary

The Workforce Investment Act of 1998 is designed to provide a streamlined system of assistance that integrates many employment and training programs through a One-Stop delivery system for employers and job seekers, including job seekers with disabilities. There are currently over 3,000 One-Stop Career Centers operating across the country. Like the Ticket to Work (TtW) program, the One-Stop system offers the promise for a new source of employment assistance to people with disabilities, including the potential for One-Stops to serve in the capacity of approved “Employment Network” (EN) providers under the TtW program.

This paper examines the extent to which people with disabilities are served through WIA’s One-Stop system and discusses its capacity to serve people with disabilities who desire employment assistance, both in terms of common barriers to access as well as promising strategies to improve service delivery to people with disabilities. The main findings are as follows:

- The WIA program enrolls a number of people with disabilities, but such individuals comprise a small proportion the customers served. In PY 2002 (July 1, 2001, through June 30, 2002), nearly 46,000 people with disabilities exited the WIA program. People with disabilities made up about 8 percent of all exiters for PY 2002. Not all the customers with disabilities had disabilities that were considered a barrier to employment; there were about 16,500 exiters in PY 2002 who had disabilities that they considered a barrier to employment.
- The Department of Labor does not track enrollment by beneficiary status. We estimate that fewer than 2,400 exiters from the adult program in PY 2002 may have been SSI beneficiaries. The trend in services to people with disabilities is mixed. For the adult program, the total number of exiters increased each year, but the number of exiters with disabilities only increased between 2000 and 2001. Once enrolled in WIA, the services received for customers with disabilities, including those with substantial barriers to employment, are close to the figures for the overall population. Exiters with disabilities have lower employment and earnings than other customers who exit the program, but they have greater earnings changes from the pre-program period. The ability to track services to SSI and SSDI beneficiaries in WIA programs would be greatly enhanced if the Department of Labor modified its reporting system to specifically note if individuals served are beneficiaries.
- At the same time, it is important to note that the estimated number of SSI beneficiaries is not that small in comparison the approximately 5,000 “tickets” that have been assigned thus far under the TtW program. Further research is needed to better determine what an appropriate target level should be for WIA.

Several different kinds of barriers to serving people with disabilities may help explain why their enrollment in WIA and its One-Stop Career Centers is so low:

- Particularly during the early years of WIA, the One-Stop Career Centers where WIA services are offered were not particularly accessible to customers with disabilities. Barriers included access to the facilities, presence of appropriate hardware and software for customers with disabilities to access information on computers and in hard copies, and ignorance by One-Stop staff regarding how identify and serve customers with disabilities.
- Upon entering a One-Stop Career Center, customers are generally expected to use the computers and printed material in a resource room on their own. It is difficult to identify people with disabilities who need special assistance or who need to be directed to special equipment, and this may discourage potential customers with disabilities from using the One-Stop Career Centers.
- Interviews conducted for this paper indicate that prospective WIA customers at One-Stop Career Centers are often referred to VR without adequately determining if they might be better served in part or completely by WIA.
- Many local WIA programs place time and dollar limits on training their customers can receive. Training for customers with disabilities is sometimes more expensive, and this may make it difficult to serve such customers with WIA funds.
- State and local WIA programs are subject to performance standards relating to employment, earnings, and credentials of customers who exit the program. There are no adjustments for serving groups that face discrimination and other barriers to employment. States and local WIBs that fail to meet standards two years in a row are subject to sanctions, including loss of the right to operate the program. The literature on training programs indicates that local programs often engage in “creaming” because of the performance standards, whereby they tend to serve fewer customers with barriers, including people with disabilities.

Although there is unquestionably still room for improvement, there appears to be general consensus that the One-Stop system as a whole—often with the help of special grant funding—has made significant strides since WIA’s inception in reducing barriers pertaining to physical access and inability to address special accommodation needs. There also appears to be growing recognition that the focus on accessibility for people with disabilities with respect to the One-Stop system must move beyond physical and technological access to include a broader effort to address programmatic access. Although there is no comprehensive source of information available to determine how fully programmatic accessibility has been achieved across the One-Stop system, various case studies of One-Stop Career Centers suggest that progress has been

made in this area as well—although generally not as much as with improving physical and technological access.

One-Stop Career Centers have pursued several different strategies to make their physical and programmatic environment more accessible and responsive to people with disabilities. Many have taken advantage of special funding initiatives sponsored by both Department of Labor (DOL) and, more recently, by the Social Security Administration (SSA) to stimulate capacity building and systems changes for the express purpose of making the One-Stop service delivery system more accessible and responsive to the needs of people with disabilities. Of most relevance of these initiatives are the Work Incentive Grants (WIGs), the Disability Program Navigator (DPN) demonstration program, and the Customized Employment Grants (CEGs).

- Since 2000, the DOL Employment and Training Administration, has funded four rounds of Work Incentive Grants (WIGs). In general, the first two rounds of WIG grantees focused heavily on increasing access to One-Stop Career Centers by using grant funds to purchase and install assistive technology in resource room and to train frontline staff on the use of assistive technology and virtual accessibility for people with disabilities. More recently, the focus has shifted to supporting a specialized “disability navigator” position within One-Stop Career Centers to address programmatic access and capacity issues.
- In 2003, the DOL Employment Training Administration and the SSA Office of Program Development and Research jointly created a grant program to fund Disability Program Navigators (DPN) at WIA One-Stop Career Centers. The strategy is to place an individual at local One-Stop Career Centers to serve as an expert on workforce development issues for persons with disabilities, and facilitate access to relevant supports and services.
- The Customized Employment Grant Program, begun by the DOL Office of Disability Employment Policy in 2001, supports local Workforce Investment Boards (WIBs) in a consortium or partnership of public and private entities, to build the capacity of local programs to deliver services to significantly disabled and disadvantaged individuals who are not usually targeted for services. Customized employment strategies include job carving, self-employment, supported employment, job restructuring, developing partnerships with local businesses, and assigning personal agents for customers.

Although many of the evaluations of these activities are ongoing, the studies that are available plus discussions with government officials and other experts indicate that the programs have made a discernible and positive impact on improving the capacity of the One-Stop Career Centers for serving customers with disabilities. One-Stops benefiting from these special grants, as well as other One-Stop Career Centers that have made efforts to improve their service capacity for people with disabilities, have engaged in multi-pronged strategies that include

multiple and ongoing training of in-house One-Stop staff to increase awareness and knowledge of disability issues, resources, and needs; ongoing use of accessibility checklists; and greater collaboration with the Vocational Rehabilitation (VR) agency and other disability-serving agencies in the community.

There had been hope that the One-Stop Career Centers and local WIBs would become participate in the TtW program by becoming ENs and expand their services to people with disabilities through this additional revenue source. Thus far, few One-Stop Career Centers have enrolled as ENs, and very few tickets have been assigned to One-Stop ENs, and the vast majority of tickets have been assigned to state VR agencies. Although some factors that inhibit participation are specific to the One-Stop Career Centers and WIBs, such as charters that prohibit undertaking the financial risks associated with accepting a ticket, the evaluations we reviewed and interviews with federal and state officials indicated that One-Stop Centers, like other potential ENs, generally do not participate because of factors such as high risk, low payments, and long delays in payments. Even if One-Stops largely opt not to become ENs, ticket holders can still benefit from the One-Stop Career Centers by virtue of the fact that core services are available to everyone, through collaboration and service delivery coordination between One-Stop Career Centers and their mandatory VR partners, and collaboration/coordination between One-Stop Career Centers and other ENs as well as SSA-sponsored Benefits Planning, Assistance, and Outreach offices (BPAOs) in the community.

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I. Introduction

The Workforce Investment Act of 1998 was designed to provide a streamlined system of employment assistance that integrates many employment and training programs through a One-Stop service delivery system for employers and job seekers, including job seekers with disabilities. There are currently over 3,000 One-Stop Career Centers operating across the country. Like the Ticket to Work (TtW) program, the One-Stop system offers the promise of a new source of employment assistance to people with disabilities, including the potential for One-Stops to serve in the capacity of approved “Employment Network” providers (ENs) under the Ticket to Work program.

The purpose of this paper is to examine the One-Stop system and its capacity to serve people with disabilities who desire assistance in preparing for and obtaining jobs. Our discussion and findings are based on an analysis of selected WIA program data, a review of existing literature, and discussions with a wide range of individuals knowledgeable about different aspects of the WIA’s One-Stop Career Center system in connection with people with disabilities (see appendix A).

The paper is organized as follows. First, a general overview of the Workforce Investment Act (WIA) and the role of One-Stop Career Centers is provided, highlighting issues of special importance to people with disabilities. Section II examines available data through the WIA system to assess the extent to which WIA has served people with disabilities and the characteristics of those served. This is followed by a discussion of key factors that impede effective service delivery for people with disabilities by the One-Stop system as well as various strategies that have been used to alleviate or overcome these barriers. We then examine the interaction between the TtW program and WIA. The final section provides conclusions.

II. Background on the Workforce Investment Act

WIA is the nation’s premier publicly funded workforce investment program, and it became effective in all states on July 1, 2000.¹ WIA was enacted to replace the Job Training Partnership Act (JTPA), which had been in effect since 1982. This section provides background information on the Workforce Investment Act (WIA), Public Law 105-20, which was signed into

¹ Some states elected to implement earlier than the July 1, 2000, date.

law on August 7, 1998. Where relevant, issues of special importance to the disability community are indicated.² WIA is based on seven guiding principles:³

- **Streamlined services.** Multiple employment and training programs are integrated at the “street level” through the One-Stop delivery system. This was intended to simplify and expand access to services for job seekers and employers.
- **Individual empowerment.** Individuals are empowered to obtain the services and skills they need to enhance their employment opportunities. This empowerment is accomplished through Individual Training Accounts (ITAs), which enable eligible participants to choose the qualified training program that best meets their needs. The development of “consumer reports” containing information for each training provider allows individuals to make informed training choices.
- **Universal access.** Through the One-Stop system, every individual has access to core employment-related services. Customers can obtain job search assistance as well as labor market information about job vacancies, the skills needed for occupations in demand, wages paid, and other relevant employment trends in the local, regional, and national economy.⁴
- **Increased accountability.** States, localities, and training providers are held accountable for their performance.
- **A strengthened role for local Workforce Investment Boards (WIBs) and the private sector.** Local boards are business-led “Boards of Directors” for the local areas.
- **Enhanced state and local flexibility.** States and localities have flexibility to build on existing reforms in order to implement innovative and comprehensive workforce investment systems. Through such mechanisms as unified planning, waivers, and Work-Flex, states and their local partners have the flexibility to tailor delivery systems to meet the particular needs of individual communities.
- **Improved youth programs.** Youth programs are linked more closely to local labor market needs and the community as a whole, and will provide a strong connection between academic and occupational learning. In addition, traditional employment and training services will be augmented by an array of youth development activities.

² The National Center on Workforce and Disability has prepared a paper describing all aspects of how WIA relates to disability issues, and some of the linkages noted in this section are based on that document. See Robert Silverstein (undated).

³ These principles are from the WIA implementation white paper available at <http://www.doleta.gov/usworkforce/documents/misc/wpaper3.cfm> on August 11, 2004.

⁴ Some observers have interpreted the “universal access” language in WIA to require that services be made available to people with disabilities. In fact, the universal access provision is intended to open up the adult and dislocated worker programs to the entire labor market. As discussed below, obligations to serve people with disabilities equitably is covered in Section 188 of the Act.

As described below, these principles led to a number of changes in how workforce programs are organized and delivered in the United States.

The Workforce Investment Act includes five titles, and the Act's authority goes beyond the WIA program itself. Title I authorizes the workforce investment system. Three separate funding streams for programs to be operated by states and local workforce investment areas are established as part of WIA Title I: adults, dislocated workers, and youth. In addition to these three funding streams, the legislation establishes a number of national programs, including the Job Corps, the Native American Program, the Migrant and Seasonal Farmworker Program, Veterans' Workforce Investment programs, and the Youth Opportunity grants pilot program.⁵ This report focuses on the funding streams for adults and dislocated workers authorized by Title I of WIA.⁶

Funding. Funds for the three programs (adult, dislocated worker, and youth) are distributed first to states and then to local workforce investment areas by formulas based on the numbers of low-income and unemployed individuals in an area. Funding for the program has been slightly over \$3 billion since the program's inception, with a slight decline in funds each year. For FY 2004, the appropriations were \$995 million for youth activities, \$899 million for adults, and \$1,178 million for the dislocated worker formula funds.⁷

WIA Administrative Structure. Like its predecessor, JTPA, WIA involves federal, state, and local governments. The law requires establishment of workforce investment boards (WIBs) at both the state and local level, with members appointed by the governor and chief elected official(s), respectively. The boards function as policy bodies for the governor and local areas, respectively. The boards may have their own staff or rely on government agencies or contractors for support. Local workforce investment areas are intended to comprise labor market areas as

⁵ Title I also establishes national efforts such as research, demonstrations, technical assistance, evaluation, and national emergency grants for dislocated workers. Title II of WIA authorizes the Adult Education and Literacy programs, and Title III amends the Wagner-Peyser Act to require that the Employment Service (Job Service) activities become part of the One-Stop Career Center system (described below). Title IV reauthorizes Rehabilitation Act programs, and Title V contains miscellaneous provisions, including authority for state unified plans for workforce programs and incentive payments to states exceeding their performance standards in three workforce programs. In this report, the focus is on the funding streams for adults and dislocated workers authorized by Title I of WIA.

⁶ Youth programs are not required to be operated through the One-Stop Career Centers, and the programs serve in school as well as out-of-school youth. Because of these differences, the focus in this paper is on the adult and dislocated worker programs.

⁷ See www.doleta.budget for budget details. In addition to the dislocated worker funds to be distributed by formula to the states, there was an additional \$277 million in the national reserve account to be distributed by the Department of Labor.

designated by the governor, and there are over 600 local workforce areas designated under WIA. A majority of the members of the WIBs must be representatives of the private sector.

States must either include the head of the State Vocational Rehabilitation (VR) agency on the state board or explain how the interests of people with disabilities are represented in the state plan (Dew, McGuire-Kuletz, and Alan 2001). Local boards are required by the statute to include a representative of the VR agency. There is no direct mention of a requirement for the VR agency to be represented on the state board, but a guidance letter from the Employment and Training Administration stated “stand-alone VR agencies, including the Blind agencies, must be on the State Board consistent with the provisions of section 111(b)(1)(C)(vi)(I) and (2) of WIA” (U.S. Department of Labor 2000). Because WIA does not explicitly require the membership of the State VR agency director, or directors (in the case of states having a separate state VR agency for the blind) on the state board, it is not surprising that a study (Elliot et al. 2002) involving nine states found only two had a representative of vocational rehabilitation on the state board.

WIA Service Delivery: The One-Stop System. Services for adults and dislocated workers are primarily provided through One-Stop Career Centers. Each local workforce investment area is required to have at least one full-service One-Stop Career Center where customers are provided information and access to a wide array of workforce programs. The local WIB, which oversees operation of the WIA Title I funds for the workforce investment area, is responsible for selecting an operator or operators for the One-Stop Career Centers in the area. One-Stop operators include state and local government agencies, nonprofit organizations, community colleges, and for-profit firms.

It is important to keep in mind that One-Stop Career Centers are places, not programs. The WIA legislation specifies that some government programs are “mandatory partners,” and those programs are required to have a presence at one or more One-Stop Career Centers in the workforce investment area. VR is the only required partner under WIA that is solely focused on people with disabilities.⁸

⁸ Other mandatory partners specified in the statute include adult, dislocated worker, and youth activities under WIA, the Employment Service (or other Wagner-Peyser Act grantee), adult education, postsecondary vocational education, Welfare-to-Work (now phased out), Title V of Older Americans Act (Senior Community Service Employment Program or the Older Workers Program), Trade Adjustment Assistance and NAFTA-TAA Veterans Employment and Training Programs, Community Services Block Grant, HUD-Administered Employment and Training Programs, and Unemployment Insurance.

In addition, state and local boards can authorize or require other partners to participate in the One-Stop Career Centers. Non-mandatory partners that are commonly present at One-Stop Career Centers include employment and training programs for recipients of Temporary Assistance for Needy Families (TANF) and Food Stamp Employment and Training, community colleges, and community-based organizations. Other organizations serving people with disabilities that sometimes serve as partners at the One-Stop Career Centers include state or county mental health agencies, state mental retardation/developmental disabilities agencies, and community-based organizations. In some instances, organizations that specialize in providing services to people with disabilities operate the One-Stop Career Centers.⁹

There are a number of options for non-partner organizations, both public and private, to work collaboratively with the workforce investment system and One-Stop Career Centers without being partners. Examples include serving as a provider for the One-Stop Career Center for services such as assessments and training, acting as a resource and consultant to the One-Stop Career Center on approaches to meeting the accessibility and service needs of people with disabilities, and assisting WIA service providers in meeting the needs of customers with disabilities (Hoff 2000).

The WIA statute requires that partners in the One-Stop Career Centers enter into a Memorandum of Understanding (MOU). The MOU functions as a contract between the One-Stop Career Center and the partner to indicate the services provided by each partner and the financial arrangements among the parties. The Act states that infrastructure costs for the One-Stop Career Centers are to be shared among the partners, and the MOU indicates the arrangement that has been agreed upon by the partners. MOUs can also be executed at the state level to discuss state agency roles and responsibilities, although state-level MOUs are not required.¹⁰ A study on the early implementation of WIA from a disability perspective found that the greatest value of the MOUs at both the state and local levels was educational—by negotiating the financial and programmatic responsibilities in advance, the parties were able to learn about each other and avoid potential conflicts in the future (Elliott et al. 2002). Interviews conducted

⁹ For example, local chapters of Goodwill Industries operate a number of One-Stop Career Centers across the country.

¹⁰ For a discussion of MOUs between state rehabilitation agencies and One-Stop Career Centers see U.S. Department of Education (1999) and Drew et al. (2001).

for the study indicated that the state MOUs remained largely symbolic, but the locally negotiated MOUs sometimes provided detailed working agreements.

WIA Provisions for Services to Persons with Disabilities. The WIA statute has several references to individuals with disabilities (see box).¹¹ As there are no statutorily required special programs for individuals with disabilities, the references in the statute mainly serve to get states and local workforce investment areas to include specific plans for serving people with disabilities and reporting how well they are serving such people. The statute also allows states and localities to serve people with disabilities who might otherwise not be eligible. In addition to the statutory references to people with disabilities, WIA regulations include a number of provisions that are relevant for customers with disabilities.

Section 188 of WIA is particularly important in assuring adequate access to people with disabilities. This section prohibits discrimination, and one aspect of compliance with this section is avoiding discrimination against people with disabilities. In addition, WIA customers are protected by the Americans with Disabilities Act and the Rehabilitation Act. The Department of Labor has issued a WIA Section 188 Disability Self-Assessment Tool that provides detailed information on the types of actions One-Stop Career Centers must take to be in compliance.¹² The regulations for WIA state that the facilities and services at the One-Stop Career Centers must be accessible to all customers, including customers with disabilities.

Statutory References to Disability in the Workforce Investment Act of 1998

- Section 101(25) modifies the definition of a “low-income individual” for individuals with disabilities to permit people with disabilities to use their own income to qualify as a low-income person rather than total family income,
- Section 112(17) requires governors to indicate in their state plans how they will meet the needs of individuals with “multiple barriers to employment...including individuals with disabilities.”
- Section 117(b) requires that local WIBs include representatives of community-based organizations representing individuals with disabilities and all One-Stop partners, which includes the vocational rehabilitation agency.
- Section 120 permits youth programs to enroll up to 5 percent of the participants youth who do not meet the low-income requirement so long as they meet another specified criterion, including being an individual with a disability.
- Section 136(d) requires governors to include in their annual performance report information on their performance for individuals with disabilities.
- Section 188(a) prohibits discrimination against a number of groups, including individuals with disabilities.

¹¹ See Robert Silverstein (undated) for an excellent summary.

¹² The Self-Assessment Tool was issued on May 17, 2004, and state and local workforce agencies are required to complete the tool by August 27, 2004, to the Department of Labor’s Civil Rights Center.

One publication (Hoff 2002) summarizes the requirements of the WIA regulations as:

- People with disabilities have a right to use the services of the One-Stop system.
- One-Stop Career Centers must be readily accessible to people with disabilities.
- People with disabilities are entitled to reasonable accommodations and modifications when using One-Stop services.
- People with disabilities should not be automatically referred to the public Vocational Rehabilitation system for services.

Types of Services in WIA. The Act specifies that services for adults and dislocated workers are classified as core, intensive, and training services, and that they are to be received in sequence. *Core services* are the least costly services and include eligibility determination, outreach, intake and orientation, initial assessment, job search and placement assistance, career counseling, access to employment statistics, access to performance and cost information on training providers, information on local area results on WIA performance measures, information on supportive services, information on filing Unemployment Insurance (UI) claims, assistance in establishing eligibility for Welfare-to-Work and financial aid, and follow-up services for 12 months after placement (65 FR 49317 (August 11, 2000)). Core services are universally available to all individuals interested in learning more about the labor market or employment opportunities. These services are often self-directed, but individuals who experience difficulty or prefer to work with a staff member may receive “core assisted services.”

Unemployed individuals who cannot find a job through core services alone are eligible to receive *intensive services*. The intensive services provided under WIA are more personalized and generally require more resources than core services (U.S. Department of Labor 1998). Examples of intensive services include comprehensive assessments of skills and service needs, development of individual employment plans, group counseling, individual counseling and career planning, case management, and short-term prevocational services.

Finally, individuals who cannot obtain a job after receiving core and intensive services are eligible for training services. *Training* includes both classroom training and on-the-job training, and provision is made for the use of customized training developed to meet the needs of specific employers. If sufficient funds are not available to serve all potential customers, priority for intensive and training services is to be given to public assistance and other low-income customers. Most training under WIA is provided through the use of individual training accounts

(ITAs), which give the customer flexibility in selecting a training vendor that meets the customer's interests and aptitudes. Authorized vendors and their programs are listed in a consumer report card that lets the WIB and the customer see how well the vendor has fared in serving WIA customers and others in the past. The ITAs are usually not an unrestricted voucher. Most WIBs have funding caps that limit how much the training can cost. If several vendors offer the same or similar training programs, the WIB might require that the ITA be used at the least expensive vendor. Finally, the WIBs typically use a "guided choice" approach to the vouchers whereby they only permit the customer to use the ITA for a program that the WIB believes will result in a job with adequate pay.¹³

Customer Flow in One-Stop Career Centers. There is no single pattern that One-Stop Career Centers follow in serving their customers, but the requirement for sequencing of services results in many similarities. In the typical One-Stop Career Center, when a customer enters the building, he or she is met by a "greeter," who welcomes the customer, asks that the customer register with the One-Stop, and shows the customer where the resource room is located. Registration at the One-Stop Career Center is *not* the same as enrollment in WIA; enrollment in WIA only takes place if the customer receives assisted core services or intensive services.

The greeter mentions the resources that are available in the resource room and indicates that the customer should speak to one of the staff members walking around the resource room if he or she needs assistance or cannot find the desired services. Resource rooms typically have a wealth of paper and software products available to customers. The customer can use personal computers to search job banks developed by the local WIB, the state Employment Service, or government and private national databases such as monster.com. The customer also can access labor market information indicating occupations with the greatest projected growth, current job openings, wage rates for various occupations, and the offerings of various training institutions and their success at placing their students. Self-service software is often available to help customers develop and print resumes, determine their interests and aptitudes, and improve their typing (or keyboarding) skills. Resource rooms also have other resources such as local newspapers, print versions of the labor market information products, and books on how to find a job and how to conduct oneself at an interview.

¹³ The Act specifies somewhat different requirements for the youth program. The youth programs need not be delivered through the One-Stop Career Centers, so they are not a focus of this report.

The resource room usually has one or more staff members who circulate among the customers to see if anyone requires assistance. These workers assist the customers in using any of the resources available and provide guidance on how to obtain intensive services or training. Customers who receive assisted core services are supposed to be enrolled in WIA, but visits to a number of One-Stop Career Centers by the authors indicate that there is wide variation in the extent to which this rule is followed. Customers may return to the resource room as often as they desire. When it becomes clear to the customer and One-Stop staff that the customer is unlikely to find a job with only core services, the customer can receive intensive services.

Intensive services include individualized counseling and assessment, and there is a great deal of variation in the amount and type of testing that is performed as well as the type and frequency of counseling. Because the WIB is held accountable in their performance standards for customers who receive intensive services, many WIBs require the customer to show a level of commitment before providing intensive services. This commonly involves requirements that the customer attend one or more workshops before being permitted to meet with a counselor on an individual basis. Customers generally continue to make use of core services such as job banks and resume preparation software while they are receiving intensive services.

If the core and intensive services fail to lead to a job, the WIB can offer the customer access to classroom or on-the-job training. Training is not an entitlement under WIA, and the statute states that if there are insufficient funds to provide training to all suitable customers, preference is to be given to low-income individuals. As mentioned above, customers selected for training opportunities are provided with individual training accounts, and they may select their program under the guidance of the staff at the One-Stop Career Center.

Performance Standards. WIA increases the use of market mechanisms, with the intention of improving the quality of programs and customer choices. An important market mechanism that is used under WIA is performance management. There are 17 performance measures for the three programs (U.S. Department of Labor 2000). The measures include entry into unsubsidized employment, employment retention for six months, earnings six months after employment, attainment of appropriate credentials, and customer satisfaction. States and local areas that achieve or exceed their performance standards can receive additional funds, but there are serious consequences for failing to meet standards for two consecutive years: states and local areas can lose some of their funding, and they can lose the right to operate the WIA program.

III. Services to People with Disabilities under the Workforce Investment Act

This section provides information on the numbers, characteristics, and outcomes of people with disabilities under WIA. For the most part, information here is restricted to the adult program.¹⁴ Reporting under WIA is based on “exitors,” which are defined as participants who no longer are receiving services from the WIA program. The exit date is the last date that services were received, and participants must be designated as exitors if they receive no services for 90 days.¹⁵ There are several important limitations to the WIASRD data. First, the system does not track customers who receive only unassisted core services. Thus, the data understate the total number of customers served by the One-Stop Career Centers. Second, customers with disabilities are determined through self-identification. Many individuals with disabilities do not volunteer this information for fear of being discriminated against, so the WIASRD data may undercount the number of customers with disabilities, particularly disabilities that are not physical in nature. In spite of these limitations, the data are useful for obtaining a picture of how well the program is serving people with disabilities.

Table 1 shows the trends for the first three years of WIA operation.¹⁶ SSI and SSDI beneficiaries are most likely to be served through the adult program, but table 1 provides information on the numbers served by all three major WIA funding streams for the first three years for readers interested in all services to people with disabilities provided through WIA.

¹⁴ Data on participants are from the Workforce Investment Act Standardized Record Data (WIASRD). WIA data are generally reported for individuals who terminate from the program (termed *exitors*) during a “program year,” which runs on a July 1 through June 30 basis. The program year begins on July 1 of the same calendar year, so program year 2000 runs from July 1, 2000, through June 30, 2001. As discussed in the previous section, WIA services are divided into core, intensive, and training services. The WIASRD excludes individuals who only receive unassisted core services. In addition to tracking all people with disabilities, the WIASRD tracks “disabled exitors with substantial barriers,” and this is defined as those whose disabilities are likely to affect their ability to work.

¹⁵ The definition for exiter and all other terms used in WIA reporting can be found in Training and Employment Guidance Letter 14-00, Change 1 Appendix E issued November 19, 2001.

¹⁶ Recall that although WIA was enacted in 1998, it did not become operational in all states until July 1, 2000.

Table 1: Exiters by Disability Status by Program and Year

Group	Program Year		
	2000	2001	2002
Total Exiters	326,702	475,282	575,442
Adult	109,868	188,202	239,252
Dislocated	99,490	142,996	178,493
Youth	119,904	148,255	164,266
Disabled Exiters	32,662	40,704	45,620 ¹⁷
Adult	9,778	13,927	13,840
	8.9%	7.4%	5.8%
Dislocated	4,179	5,577	6,783
	4.2%	3.9%	3.8%
Youth	18,705	21,200	25,297
	15.6%	14.3%	15.4%
Disabled Exiters with Substantial Barriers	13,970	15,226	16,469
Adult	3,406	4,329	4,196
	3.1%	2.3%	1.8%
Dislocated	1,691	2,002	2,142
	1.7%	1.4%	1.2%
Youth	8,873	8,895	10,020
	7.4%	6.0%	6.1%

Source: 2002 WIASRD Data Book

¹⁷ The number of adults, youth, and dislocated workers totals to 45,980, but the WIASRD report indicates a total of 45,620 with no explanation of the discrepancy.

The number of exiters increased substantially over the three-year period: there were 326,000 exiters from all three programs combined in PY 2000 and 575,000 in PY 2002. Some of the increase may be an artifact due to problems in implementing the data system in the first two years. Several facts and trends are apparent from the WIASRD data:

- People with disabilities constitute a small share of the exiters in the three funding streams. They are most common in youth programs, where they constitute approximately 15 percent of the exiters, and least common in the dislocated worker programs, where they are only 4 percent of the exiters across the three years.
- The trend in services to people with disabilities is mixed. For the adult program, the total number of exiters increased each year, but the number of exiters with disabilities only increased between 2000 and 2001.
- The proportion of exiters with a disability decreased each year, beginning at 8.9 percent in PY 2000 and falling to only 5.8 percent in PY 2002.
- The number of exiters with disabilities in the dislocated worker program increased each year, but there was a steady decline in the proportion of exiters with disabilities. Over the three years, the proportion with disabilities fell from 4.2 percent in PY 2000 to 3.8 percent in PY 2002.

The WIASRD also tracks the number of disabled exiters with substantial barriers to employment. Only a very small proportion of WIA exiters meet this criterion, and well over half are in the youth program. The total number of exiters in the adult program who had disabilities that were considered a substantial barrier to work was 3,406 in PY 2000 and increased to 4,307 in PY 2002. As a proportion of all exiters from the adult program, disabled exiters with a substantial barrier declined from 3.1 percent in PY 2000 to 2.3 percent in PY 2001 and 1.8 percent in PY 2002. For the youth program, the number of participants with a disability that constituted a substantial barrier increased and the proportion declined as well. Disabled exiters with a substantial barrier from the youth program increased from 8,873 in PY 2000 to 10,020 in PY 2002, but the proportion of all exiters from the youth program with a substantial barrier declined from 7.4 percent in PY 2000 to 6.1 percent in PY 2002.

Characteristics of exiters from the adult program in PY 2002 by disability status are shown in table 2.

Table 2: Characteristics of PY 2002 Adult Exiters by Disability Status

	Group		
	All	Any Disability	Substantial Barrier
Total Exiters	239,252	13,840	4,196
<u>Characteristics of Exiters</u>			
Age Categories			
18 to 21	12.7	8.7	10.2
22 to 29	27.7	17.8	20.6
30 to 44	38.9	42.2	42.3
45 to 54	15.2	23.0	20.0
55 and over	5.6	8.3	6.9
Gender			
Female	56.1	46.8	48.2
Male	43.9	53.2	51.8
Individual with a Disability			
Substantial barrier	1.8	30.3	100.0
Other disabilities	4.0	69.7	0.0
Race and Ethnicity			
Hispanic	21.4	15.6	13.3
Non-Hispanic			
American Indian/Alaskan	1.4	1.5	1.9
Asian	3.6	2.2	1.4
Black or African American	33.3	30.7	29.8
Hawaiian or Pacific Islander	0.6	0.3	0.5
White	39.0	48.3	51.5
More than one race	0.7	1.6	1.6
Veteran			
Disabled veteran	0.5	5.2	3.9
Campaign veteran	2.6	7.5	5.8
Vietnam-era veteran	1.3	4.1	3.8
Recently separated veteran	0.6	1.0	0.8

Table 2: Characteristics of PY 2002 Adult Exiters by Disability Status (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Employed at Registration			
Employed	18.4	13.0	15.3
Not employed	81.6	87.0	84.7
Average Preprogram Quarterly Earnings	\$3,766	\$3,280	\$3,100
None	36.1	49.4	46.2
\$1–\$2,499	29.1	26.9	27.8
\$2,500–\$4,999	18.8	13.6	15.9
\$5,000–\$7,499	8.7	5.4	6.3
\$7,500–\$9,999	3.8	2.6	2.4
\$10,000 or more	3.5	2.1	1.4
Limited English Proficiency	7.6	5.2	6.5
Single Parent	24.4	21.2	19.4
UI Status			
Claimant	15.4	13.4	12.8
Claimant referred by WPRS	2.5	1.7	1.7
Exhaustee	3.2	4.4	2.7
Low Income	70.2	80.8	81.0
Public Assistance Recipient	13.8	28.6	25.1
TANF	9.4	10.8	12.2
Other public assistance	5.4	19.8	15.1
Pell Grant Recipient	4.7	4.0	4.4
Highest Grade Completed			
8th or less	3.7	3.9	3.7
Some high school	15.8	15.7	15.9
High school	49.0	46.6	45.3
GED	6.9	5.2	5.6
Some college	17.4	21.2	22.3
College graduate	7.1	7.4	7.2

Source: 2002 WIASRD Databook

Exiters with disabilities differ from the general population of exiters in some respects. The exiters with disabilities are more likely to be older, male, non-minority, a veteran, and low-income than other exiters. On most other characteristics, exiters with disabilities and other exiters are fairly similar.

Table 3 shows the type and characteristics of services received for exiters from the adult program in PY 2002 by disability status.

Table 3: Services Received by PY 2002 Adult Exiters by Disability Status

	Group		
	All	Any Disability	Substantial Barrier
Total Exiters	239,252	13,840	4,196
Co-enrollment			
WIA dislocated worker	1.8	1.3	1.0
WIA youth	0.9	1.2	1.5
Partner program	26.5	24.1	22.8
Wagner-Peyser	13.5	12.5	11.2
Veterans programs	1.7	3.0	2.0
Adult education	3.1	2.9	2.1
Welfare to Work	1.4	0.9	0.8
Other DOL-funded	1.0	1.0	0.8
Other partner programs	10.8	9.8	10.4
Weeks Participated (Average)	40.4	44.0	50.8
26 or fewer weeks	44.6	45.2	38.5
26 to 52 weeks	25.6	22.5	22.9
More than 52 weeks	29.7	32.3	38.6
Service Category			
Core services only	17.8	15.0	21.5
Intensive and core services only	37.2	40.9	33.4
Training services	45.0	44.1	45.1
Basic skills	6.6	14.2	13.2
On-the-job	11.7	8.2	10.0

Table 3: Services Received by PY 2002 Adult Exiters by Disability Status (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Occupational and other	87.7	90.7	89.8
ITA Established	25.6	21.3	22.6
Occupation of Training			
Managerial, professional, technical	28.6	27.9	31.3
Service occupations	22.0	23.4	18.9
Sales and clerical	20.0	23.6	26.6
Farming, fishing, forestry, construction, and extraction	0.2	0.1	0.0
Installation, repair, production, transportation, material moving	29.1	25.0	23.2
Needs-Related Payments	3.9	3.4	3.9
Other Supportive Services	18.9	21.4	25.1

Source: 2002 WIASRD Databook

WIA customers can be co-enrolled in other WIA programs or partner programs. Co-enrollment patterns for exiters with disabilities are similar to the patterns for all exiters, and very few WIA adult customers are co-enrolled in vocational rehabilitation—only 10 percent of the disabled exiters are reported as being co-enrolled in “other” programs, including vocational rehabilitation.^{18 19}

Exiters with disabilities participate longer than the general population, and those with substantial barriers participate longer still. The mean length of participation for all exiters in PY 2002 was 40 weeks, but exiters with disabilities remained 44 weeks on average, and those with substantial barriers remained 51 weeks.

¹⁸ The other programs included along with vocational rehabilitation are vocational education, employment and training programs carried out under the Community Services Block Grant Act, employment and training programs carried out by the Department of Housing and Urban Development (HUD), Food Stamps Employment and Training, and other non-DOL programs. See Social Policy Research Associates (2004). *PY 2002 WIASRD Data Book*. Oakland, CA: Social Policy Research Associates, May 6, 2004. p. 231.

¹⁹ Discussions with DOL staff indicate that co-enrollments are not always reported, so the figures here might understate the extent that WIA customers are co-enrolled in VR programs.

Table 4 compares the outcomes for exiters with disabilities from adult programs from October 1, 2001, to September 30, 2002, with the outcomes for the general population of exiters. (Note that these data cover a different period than the other tables so the number of customers included is different.) Customers with disabilities have lower entered employment rates than other exiters, and their post-program earnings are lower than the earnings of other exiters. However, exiters with disabilities who are placed have greater earnings gains.²⁰ These differences in outcomes are of particular importance because states and local programs face performance standards on their customers' employment and earnings and can lose the right to operate the programs if they fail to meet their standards.

It would be desirable to report post-program earnings on a monthly basis so that earnings could be compared with the substantial gainful activity levels that are used in determining continued eligibility for disability payments (\$810 a month for non-blind beneficiaries and \$1,350 a month for blind beneficiaries), but the data for table 4 were obtained from state unemployment insurance wage records, which are only available in most states on a quarterly basis. Monthly figures can be obtained by dividing the quarterly earnings by 3, but this is only an approximation because the earnings may not have occurred evenly over the quarter. Thus, the approximate level of monthly earnings for exiters with a substantial barrier to work was \$1,253 in the first quarter after exit, \$1,299 in the second quarter after exit, \$1,328 in the third quarter after exit, \$1,343 in the fourth quarter after exit, and \$1,377 in the fifth quarter after exit for those with earnings.

Table 4: Outcomes of Adult Exiters by Disability Status from 10/01 to 9/02

	Group		
	All	Any Disability	Substantial Barrier
Total Exiters	202,844	14,308	4,334
WIA Performance and 12-Month Outcomes			
Entered employment	74.4	63.5	67.7
Retained employment 3rd quarter after exit	82.8	79.0	83.2

²⁰ Exiters with disabilities have greater earnings changes because they have lower pre-program earnings than exiters without disabilities.

Table 4: Outcomes of Adult Exiters by Disability Status from 10/01 to 9/02 (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Retained employment 5th quarter after exit	73.9	67.8	71.8
Earnings change			
2nd and 3rd quarters after exit	\$3,045	\$2,927	\$3,483
4th and 5th quarters after exit	\$2,806	\$2,731	\$3,543
Credential and employment rate	60.9	50.8	53.4
Information about Employment in Quarter after Exit			
Occupation of Employment			
Managerial, professional, and technical	19.6	17.3	16.8
Service occupations	24.5	27.8	26.4
Sales and clerical	25.7	27.1	28.3
Farming, fishing, forestry, construction, and extraction	0.6	1.0	0.7
Installation, repair, production, transportation, and material moving	29.6	26.8	27.8
Training-Related Employment	76.9	73.6	73.8
Nontraditional Employment	3.3	3.7	4.8
Males	2.6	3.6	6.2
Females	3.8	3.9	3.6
Employment			
Quarter after exit	76.6	65.5	69.7
Third quarter after exit	69.6	58.2	64.2
Fifth quarter after exit	63.1	52.1	58.6
Average Earnings (among Earners)			
Quarter after exit	\$4,302	\$3,813	\$3,759
Second quarter after exit	\$4,493	\$3,903	\$3,896
Third quarter after exit	\$4,604	\$4,018	\$3,985
Fourth quarter after exit	\$4,686	\$4,139	\$4,028

Table 4: Outcomes of Adult Exiters by Disability Status from 10/01 to 9/02 (cont.)

	Group		
	All	Any Disability	Substantial Barrier
Fifth quarter after exit	\$4,552	\$4,309	\$4,131
Earnings First Quarter after Exit			
\$1 to \$2,499	31.5	38.3	36.8
\$2,500 to \$4,999	35.3	34.7	36.8
\$5,000 to \$7,499	20.4	17.6	17.7
\$7,500 to \$9,999	7.5	5.7	5.3
\$10,000 or more	5.3	3.8	3.4
Earnings Third Quarter after Exit			
\$1 to \$2,499	29.2	36.6	35.7
\$2,500 to \$4,999	33.5	33.1	34.7
\$5,000 to \$7,499	21.9	18.9	19.4
\$7,500 to \$9,999	8.9	7.0	6.2
\$10,000 or more	6.5	4.3	4.1
Attained Credential			
High school diploma/GED	2.9	1.9	1.8
AA ,AS, BA, BS or other college degree	4.7	6.8	8.1
Occupational skills license/credential/certificate	54.7	47.7	47.5
Other	10.4	10.5	11.3

Source: 2002 WIASRD Databook

In summary, there appears to be more of a problem with access to the WIA program for customers with disabilities than with the services received once enrolled. Individuals with disabilities in general and those with substantial barriers to employment in particular are not served in large numbers.²¹ At the most, about 2,400 or slightly less than 1 percent of the adult

²¹ In many interviews we heard that One-Stop Career Centers often refer people with disabilities to VR agencies rather than serve them with WIA funds.

exiters in 2002 may have been SSI beneficiaries.²² As discussed later, the numbers served by TtW and VR are somewhat greater, but not substantially so. Although the number of exiters with disabilities has increased over the life of WIA, the proportion of WIA exiters who have disabilities or substantial barriers to employment has decreased. In PY 2002, only 5.8 percent of all adult exiters had a disability and only 1.8 percent of adult exiters had a disability that created a substantial barrier to employment. However, once enrolled in WIA, the services received for customers with disabilities, including those with substantial barriers to employment, are similar to the figures for the overall population. Exiters with disabilities have lower employment and earnings than other customers who exit, but they have higher earnings changes from the pre-program period.

IV. Challenges and Strategies for Achieving Effective One-Stop Service Delivery for Persons with Disabilities

This section focuses on factors that create barriers to effective service delivery for people with disabilities by the One-Stop system as well as strategies that have been used to alleviate or overcome these barriers. Our discussion primarily draws upon the work of several research projects involving case studies of One-Stop Career Centers and the insights and observations of knowledgeable researchers and practitioners in the field.

Key Challenges and Barriers. The key challenges and impediments to providing people with disabilities services through the One-Stop system stem from a variety of factors. Some issues that present challenges are relatively specific to addressing the special needs of people with disabilities. Others, however, are less about challenges related to serving people with disabilities per se than difficulties that are inherently embedded in attempting to create a seamless and effective One-Stop workforce development system out of a fragmented patchwork of programs and services.

²² This is based on the proportion of exiters with a disability that is a barrier to work and who receive public assistance other than TANF. There is no way to estimate the proportion of WIA customers who are SSDI beneficiaries.

Conflicting Philosophy and Programmatic Priorities

The underlying philosophy and priorities of the workforce development system was not developed to be responsive to the needs of people with disabilities versus other kinds of job seekers. It is a generic model based on short-term services with the goal of immediate employment when appropriate, and intensive services and training when the core services are insufficient. Core services promote the use of self-directed, self-paced and self-managed services, all of which may be difficult for people with disabilities to access and navigate. Limited funding has led many workforce boards to limit the time and resources for intensive services and training.

In short, the WIA One-Stop system model is not designed to address the need for a wide array of accommodations and other supports that people with disabilities may need to achieve employment or to work with individuals along a long-term career path, complete with long-term supports. This means that without collaboration with entities that do possess disability expertise, the ability of One-Stop Career Centers to increase their capacity to serve those with disabilities is constrained.

However, differences in philosophies guiding the service approaches adopted by the One-Stop system and disability serving agencies also present significant challenges for their collaboration in service delivery (Cohen et al. 2003). Vocational rehabilitation and other disability serving agencies are “specialized” service providers and, as such, are very sensitive to the potential for services to people with disabilities to suffer as a result of increased involvement with a generic One-Stop system.

In particular, although a mandatory partner in the One-Stop system on paper, the underlying philosophy that shapes VR’s long-term rehabilitation model, including ongoing case management, is often viewed to be fundamentally at odds with the emphasis on self-service and job placement in full-time employment that drives the one-stop system. Further, these systems have different funding streams, client bases, and incentives for serving clients that support their particular underlying service philosophy but which create additional challenges and disincentives for collaboration.

Access and Accommodation Barriers

From a disability perspective, ensuring full access to services provided through the One-Stop system is the foremost requisite for fulfilling WIA's promise of a workforce development system that is capable of serving the needs of all job seekers, *including* those with disabilities.

The issue of accessibility is often framed in terms of physical and technological accommodation. The concept of a centralized location offering information and resources for finding employment is attractive for people with disabilities in that it theoretically reduces the need to travel to different places for employment assistance. However, in the absence of specific efforts to identify and eliminate physical barriers, the buildings in which One-Stop Career Centers operate might not always be structurally accessible or accessible by public transportation. Similarly, lack of assistive technology—computer software, height-adjustable work stations, assistive listening devices screen readers, alternative keyboards, and Braille signage—is often cited as another common access barrier.

Beyond physical and technological accommodation issues, there are many barriers to access of a programmatic nature that may impede the ability of individuals with disabilities to take advantage of the full range of One-Stop services. Under the Job Training Partnership Act (JTPA), the predecessor of WIA, employment and training services were typically provided by staff with little or no experience with working with people with disabilities or addressing their employment needs. People with apparent or self-disclosed disabilities were often considered the responsibility of the vocational rehabilitation (VR) system and therefore issues of programmatic accessibility simply had not received attention. In addition, some disabilities, particularly mental disabilities, are often difficult to identify and hence remain “hidden.”

When One-Stop staff, particularly receptionists (the “greeters”) and resource room staff lack familiarity or experience with disability issues, they are more likely to be uncomfortable dealing with people with disabilities. Lack of training coupled with lack of awareness on disability-related issues also make it less likely that One-Stop staff will be able to help people with disabilities access core services through the use of assistive technologies or identify a hidden disability, and more likely to automatically refer the individual to VR rather than encourage them to explore the resource room, attend orientation sessions, and take full advantage of the variety of One-Stop services (Fesko et al. 2003).

A related barrier is limited staffing in the One-Stop Career Center resource rooms. The self-service features of One-Stop resource rooms generally diminish the need for staff. However, resource rooms must have sufficient trained staff on hand to provide one-on-one assistance in the use of the assistive technology available when an individual with a disability does attempt to take advantage of One-Stop core services. In many cases, people with disabilities may need special accommodations, such as a reader or some type of physical support to access the information provided in the resource rooms. Unfortunately, it is not possible to fully equip each resource room with every possible accommodation.

The potential for delivering effective services for people with disabilities may be undermined because One-Stop staff is unaware that a customer has a disabling condition. Although some disabilities are easy to observe, many are not. The customer may not want his or her disabilities to be known for fear of being discriminated against by employers. Although One-Stop staff is legally permitted to inquire about the presence of a disability, the decision to disclose rests upon the customer. Thus One-Stop staff may not even be aware that the customer they are assisting could benefit from any special assistive technologies or other services that the Career Center is equipped to provide.

Finally, another barrier is that people with disabilities or the organizations that traditionally serve them may lack knowledge or have misperceptions about the kinds of services One-Stop Career Centers can provide or a negative perception of the One-Stop system (Fesko et al. 2003). In Bader's study (2003) of One-Stop best practices, anecdotal information suggested that while some people with disabilities fully expected to be able to access and use One-Stop services, others totally rejected the idea of seeking assistance from One-Stop Career Centers due to negative word of mouth from disability service providers and others in the disability community. Others interviewed for this study noted that bad or disappointing experiences with One-Stop Career Centers, particularly during the early implementation period, led to a generally negative or at best skeptical perception of One-Stop Career Centers among disability serving organizations and decreased the likelihood of their encouraging their clientele to seek out One-Stop Career Centers service offerings.

Collaboration and Service Coordination Challenges

The ability of the One-Stop Career Centers to truly provide seamless services depends in large part on the extent to which mandatory and non-mandatory partner agencies are able to engage in productive collaboration and coordination. There are many systemic barriers to service coordination that apply to One-Stop Career Centers that affect service delivery in general and are not specific to people with disabilities. Differences in philosophies and organizational culture, turf issues, statutory and regulatory requirements, as well as different target populations (with different needs), funding streams, and reporting requirements are commonly mentioned in the literature that identifies service coordination barriers, including those found within the One-Stop system (Holcomb et al. 1993; Martinson 1999).

Of particular relevance for this paper is the role of the state vocational rehabilitation (VR) partner agency within the One-Stop system and barriers to collaboration between VR and the larger One-Stop system. In a 2002 survey of disability-serving organizations, the majority of respondents (80 percent) strongly or somewhat agreed that most people with disabilities entering the One-Stop system are referred to VR or other disability-specific agencies (35 and 45 percent, respectively). Only 8 percent neither agreed nor disagreed with that statement, while another 8 percent disagreed that VR would handle most job seekers with disabilities who enter the One-Stop system. In a survey conducted by the same organization of One-Stop managers and operators, 70 percent agreed or strongly agreed that VR would handle most job seekers with disabilities, with 17 percent remaining neutral and 13 percent disagreeing (Funaro and Dixon 2002).

If all individuals that enter One-Stop Career Centers are automatically referred to VR, then the One-Stop system is merely another conduit to VR rather than an additional resource for people with disabilities. However, if the VR agency is truly a collaborative partner in the One-Stop system, then there is the potential for people with disabilities to benefit from an increased menu of service options and expertise that they would not otherwise be afforded.

One-Stop Career Centers can (and do) offer services to those with less significant disabilities in need of employment assistance who may not be eligible for VR services. They can also provide an additional resource for those who are eligible for VR services but may not be interested in participating in VR services or cannot because VR agencies have had to impose

“order of selection.”²³ VR clients can also benefit from additional employment assistance resources (e.g., job listings, labor market information, and workshops on interviewing skills) available through the one-stops. One-Stop Career Centers can benefit from the disability expertise of VR staff on accessibility and accommodations. For example, a study of WIA implementation and its effect on the Vocational Rehabilitation program found that VR’s participation in the One-Stop system led to the provision of technical assistance and advice, particularly regarding access issues, to One-Stop Centers and their partner programs (Elliot et al. 2002).

Defining the role of VR within the One-Stop system and establishing effective collaborative partnerships has presented formidable challenges. Interviews with both federal and state officials acknowledged that VR agencies have been critical or skeptical of many aspects of WIA and One-Stop Career Centers and generally resistant to collaboration. The degree to which VR and One-Stops have been able to overcome challenges to collaboration and establish effective partnerships appears to vary extensively across states and across localities within states.

An examination of key issues for delivering VR within the WIA One-Stop system noted that a chief challenge for successful partnership between the One-Stop system and VR is finding a way for the One-Stop Career Center to fulfill its mission to address the unique needs of persons with disabilities with intensive service needs while participating in a generic system that is supposed to serve everybody, including those with disabilities. VR is often viewed as a partner that does not fit well within the One-Stop Career Centers (Barnow and King 2003).

In addition, collaboration has proven difficult because VR program participation in the One-Stop system must be consistent with VR program requirements in the Rehabilitation Act, meaning that VR staff and funds cannot be used to meet the needs of non-VR clients. This raises general cost allocation issues as well as staffing issues, such as whether and how VR staff can be used in One-Stop Center resource rooms or participate in the range of workshops offered at the One-Stop Career Centers (Dew et al. 2001; Institute for Community Inclusion 2002).

Barriers to Participation in Intensive and Training Services

Although core services are supposed to be made available to anyone, funding constraints in combination with performance standards that reward employment outcomes can lead states to

²³ Order of selection is a requirement that VR agencies with insufficient resources must develop criteria to select those with the greatest impairments for services.

establish narrower eligibility requirements for intensive and training services. For states that have imposed fixed periods of time people can spend in training and fixed amounts of dollars that can be spent per person on training, those with disabilities are less likely to be helped. For training to be meaningful and effective, it is likely that people with disabilities will need training that ultimately costs more than what the cap allows and lasts longer than two years.²⁴

In addition, the training programs on the eligible training provider list may not be conducive to people with disabilities. Training is typically classroom based with completion tied to a diploma/certificate (e.g., like those provided through community colleges). Thus, unless state and local WIBs are willing to consider alternatives to classroom training and extend time limits on training, the extent to which people with disabilities can really make use of WIA training is limited.

As noted previously, WIA performance standards are not adjusted to reflect any additional costs or difficulties associated with serving customers with disabilities. There is widespread concern that the existing performance measures, and the pressure placed on One-Stop operators and staff to meet these performance standards, produces a powerful disincentive for One-Stops to serve people with disabilities and reinforces simply referring those with disabilities who come through the One-Stop door over to the VR agency.

The perception that individuals with disabilities are less likely to achieve successful outcomes, as was documented in table 4, can also make One-Stop staff reticent to provide people with disabilities the opportunity to engage in WIA funded intensive services or training services as well as undermining interest for One-Stop operators to initiative creative and proactive strategies to improve services to people with disabilities at every level (Bader 2003; Fesko et al. 2003; U.S. GAO 2002). The most serious problem is that many people with disabilities are unable to work sufficient hours to earn enough to meet the WIA earnings performance measures. In addition, some people with disabilities who could work full time are reluctant to do so for fear of losing the health benefits provided by Medicaid or Medicare.

Strategies for Improving One-Stop Service Delivery to People with Disabilities. Overall, there is widespread recognition that people with disabilities are not going to use or benefit from One-Stop Career Centers on a widespread basis unless the One-Stop system makes a

²⁴ The average cost for VR cases that were reimbursed by SSA in 2004 was \$12,500, which exceeds the cap for ITAs in many local workforce investment areas.

commitment to address existing barriers to service by people with disabilities that is accompanied by a proactive effort at the local level to take needed steps to accomplish this. The specific mix of challenges and the specific combination strategies and resources needed to respond to these challenges varies in part because the One-Stop system itself is so decentralized and rich in variation. One-Stop Centers are at many points in the spectrum in terms of how much emphasis and attention has been given to trying to make WIA and the services delivered through One-Stop Career Centers responsive to the needs of people with disabilities.

Since 2000, an overarching effort undertaken at the federal level is to use targeted federal grant initiatives to stimulate capacity building and systems changes for the express purpose of making the One-Stop service delivery system more accessible and responsive to the needs of people with disabilities. Of most relevance to this paper are the Work Incentive Grants (WIGs), the Disability Program Navigator (DPN) demonstration program and the Customized Employment Grants (CEGs) (see boxes).

A review of available studies and interviews with key state WIA respondents with DPN and/or WIG grants and other key respondents suggests that these disability-targeted resources have made a positive difference. Sources indicate that the grantees have been able to make significant progress in filling gaps in resources, expertise, and capacity that commonly exist in One-Stop Career Centers. Several respondents noted that while it is difficult to make generalizations about One-Stop Career Centers due to their decentralized decisionmaking and service delivery structure, there was a notable difference between One-Stop Centers that had benefited from these additional disability-targeted resources and those that had not. One respondent noted that these grants were not merely providing glue to shore up weak links in current capacity and services, but also giving One-Stops “the resources and freedom to innovate.” It should also be noted that some One-Stop Career Centers have benefited from multiple grants over a period of years, which has allowed sites to build and expand on previous disability-related work and benefit from the cumulative impact of these efforts.

Department of Labor and Social Security Administration Disability Program Navigator Initiative

In July 2003 the Department of Labor, Employment Training Administration and Social Security Administration, Office of Program Development and Research jointly created the Disability Program Navigator Initiative, a two-year grant demonstration project that support the use of a specialized “navigator” position within One-Stop Career Centers. The DPN initiative is designed to provide seamless and comprehensive services to persons with disabilities in One-Stop Career Centers; increase employment and self-sufficiency for Social Security beneficiaries and others with disabilities; facilitate access to programs and service; and facilitate linkage to the employer community. Navigators are hired by the state or local workforce development WIA system, and receive relevant training by federal program staff and technical assistance consultants.

Recognizing that disabled job seekers often face a complex set of rules in navigating the complex provisions of various programs that impact their ability to transition to work, Navigators provide information and referrals to customers with disabilities and help build the capacity of One-Stop staff to better serve these customers. Additionally, the Navigator functions as a liaison with multiple agencies in the community and broader workforce development system. As there are ongoing efforts at many One-Stop Career Centers to improve services to individuals with disabilities and improve community collaborations, the Navigator position is supposed to complement rather than duplicate these efforts.

The role of the Navigators, for example, can include

- helping disabled customers leverage available funds and services including cash assistance, housing, transportation, and other public and private resources;
- training other staff within and outside of One-Stop center on activities, services, and resources available for disabled customers or employees;
- promoting the hiring of people with disabilities among employer and employer organizations, and facilitating job placement;
- serving as a resource to other workforce investment staff in the community;
- helping prepare Memorandums of Understanding (MOU) with other agencies regarding sharing customers, resources and information;
- helping prepare the One-Stop Career Center’s application to become an Employment Network under the Ticket to Work program, and developing One-Stop capacity for serving Ticket to Work beneficiaries;
- providing ongoing assessment of One-Stop center facilities, services, programs, equipment, communications and policies to ensure they are appropriate for customers with disabilities.

The Rehabilitation Research and Training Center on Workforce Investment and Employment Policy for Persons with Disabilities at the Law, Health Policy & Disability Center at the University of Iowa College of Law is conducting a process evaluation of the DPN initiative.

Eligible Applicants

Grants are awarded to state Departments of Labor or other state entity administering Title I WIA programs and Wagner-Peyser, or local workforce systems.

Length of Grant

Grants are for two-year pilot demonstrations.

Amount

The total grant amount awarded have doubled from \$6 million in 2003 to \$12 million in 2004.

Grants Awarded

Approximately 221 DPN Navigator positions have been established so far in 14 states in which SSA is undertaking employment support initiatives: AZ, CA, CO, DE, FL, IL, IN, IO, MA, MD, MS, NC, NJ, NM, NY, OK, SC, TN, TX, UT, VT, WA, and WI.

This section describes some promising strategies that are being undertaken to make the One-Stop system more responsive to the employment needs of people with disabilities. These include the use of a specialized disability navigator staff position; improving physical access and accommodations; increasing staff capacity to respond to people with disabilities within the One-Stop Career Centers; and expanding service and training capacity through better collaboration with disability-serving organizations and blending funding from different programs.

Use of “Disability Navigators” to Improve One-Stop Service Capacity

The Disability Navigator position has been viewed as a promising strategy for helping One-Stop Career Centers address both accommodation and access issues in ways that increased system capacity and encouraged systems change. While the disability-related work funded by DOL under the early WIG grants focused heavily on increasing access to One-Stop Career Centers by purchasing and installing assistive technology and training frontline staff on the use of assistive technology, some One-Stop Career Centers that received WIG grants (as well as other kinds of grants seeking to effect systems change) also experimented with dedicating a staff person to serve as a disability resource specialist. Over time, a more concerted effort has been made to expand the number of Disability Navigator-like positions and explore how this position can serve as an effective model for addressing programmatic access and capacity issues within the One-Stop system.

Specifically, the focus of the most recent two rounds of WIG grants (i.e., 2003 and 2004) has increasingly shifted toward using grant awards to support more specialized “disability navigator” positions within One-Stop Career Centers. In addition, the implementation of a disability navigator model is the focus of a relatively new Disability Program Navigator pilot initiative jointly funded by the Department of Labor and the Social Security Administration that began in mid-2003. There are approximately 348 navigator positions in 36 states that are currently funded either through WIG grants or DPN grants.

Navigators, regardless of the particular funding source, engage in a wide range of activities, including collaboration with other partners and service providers (e.g., VR, Mental Health); training and education on disability issues for One-Stop staff, e.g., providing staff information and assistance on identifying hidden disabilities, assistive technologies, and

Department of Labor Work Incentive Grants

The Work Incentive Grant (WIG) program, begun by the Department of Labor, Employment and Training Administration in 2000, has awarded four rounds of grants to enhance employment and career advancement opportunities for people with a wide range of disabilities at WIA One-Stop centers. The WIG program aims to build infrastructure at existing workforce development sites to address deficiencies in how the workforce development system handles job seekers with disabilities, including psychiatric and other hidden disabilities.

Funds can be used generally to facilitate a seamless workforce development system of universal access for adults and youth with disabilities, including

- augmenting disabled individuals' physical and programmatic access to the system
- ensuring access to knowledgeable benefit counselors
- establishing a strategy for and carrying out outreach to the disability community
- developing linkages and coordination with other public and private programs and service providers that can support the work integration of disabled individuals
- providing training and education to frontline staff and business groups to be better able to identify and assist people with disabilities
- providing assistive and adaptive technologies to accommodate the needs of disabled customers
- developing One-Stop Career Center capacity as a provider for Ticket to Work beneficiaries

In general, the first two rounds of WIG grantees focused heavily on increasing access to One-Stop Career Centers by using grant funds to purchase and install assistive technology in resource room and to train frontline staff on the use of assistive technology and virtual accessibility for people with disabilities. More recently, the focus has shifted to increasing outreach, establishing collaboration with multiple agencies that serve jobseekers with disabilities, and expanding the use of "disability navigators" within One-Stop Career Centers to spearhead and foster these kinds of capacity-building activities. This specialized staffing model is also the focus of the jointly funded SSA-DOL Disability Program Navigator (DPN) initiative (see DPN box for a fuller description of activities carried out disability navigators.) There are currently approximately WIG-funded 126 navigator-like positions.

The Rehabilitation Research and Training Center on Workforce Investment and Employment Policy for Persons with Disabilities at the Law, Health Policy & Disability Center at the University of Iowa College of Law is conducting a process evaluation of the WIG grant initiative. Process evaluation findings from the first two rounds of WIG grantees can be accessed at

<http://disability.law.uiowa.edu/lhpdc/projects/doltech.html>.

Eligible Applicants

State departments of labor or other state entity administering Title I WIA programs and Wagner-Peyser; state-level Workforce Investment Boards (WIB); local WIBs or a consortia of local public and private nonprofit entities in partnership with a One-Stop career center. Preference is given to workforce investment areas that have not previously received a WIG.

Length of Grant

Grants are for 24 to 30 months.

Amount

Awards range from \$100,000 up to \$1,000,000. Over \$75 million has been awarded from 2000 through 2004.

Grants Awarded

Work Incentive Grants have been awarded to 113 boards and consortia since 2000 in 44 states and the District of Columbia: AL, AK, AR, AZ, CA, CO, CT, DC, FL, GA, HI, IL, IN, IO, KA, KY, LA, MA, ME, MD, MA, MI, MN, MO, MT, NC, NE, NH, NJ, NM, NY, OH, OK, OR, PA, RI, SD, TN, TX, UT, VA, VT, WA, WI, and WV.

accommodations; providing information on SSA work incentives and employment support programs; conducting outreach and networking with employers; identifying and reducing accessibility barriers; and providing information about and referral to disability resources.

Based on our review of available studies and interviews with knowledgeable respondents, Disability Navigators have played an instrumental role in establishing and facilitating partnerships with VR and other partners that serve people with disabilities. Bader's study of disability-related best practices that facilitate the use of One-Stop Career Centers by people with disabilities noted that "the role and importance that disability resource specialists hold within the centers is key to the inclusion of people with disabilities in its services" and that "almost all key informants for the study stated that the disability resource specialists and the grant program that created the position at the One-Stop is the reason that their One-Stop Career Center is viewed as effectively serving individuals with disabilities." The Navigator concept has only been implemented in a small share of One-Stop Career Centers nationwide but appears to be a promising approach worth continued assessment and investment.

Increasing Access to One-Stop Career Center Services

A key strategy for improving service delivery to people with disabilities is to increase staff awareness and knowledge on a host of disability-related issues through a variety of training opportunities. Typical topics covered in training include general disability awareness and sensitivity, compliance with provisions of the Americans with Disabilities Act (ADA), identifying and assessing hidden disabilities, disability resources in the community, SSA work incentive programs and benefits planning services, and using assistive technology and adaptive equipment. Training staff on how to help people use assistive technology has also been found to be critical; if staff cannot help people with disabilities use the assistive technology available to them in the One-Stop Career Centers, the investments that One-Stop Career Centers have made in this area are significantly compromised. Cross training between One-Stop staff and other disability serving agencies (including but not limited to VR) allows staff from all agencies to become familiar with each other's services and to appreciate the potential for greater collaboration.

Department of Labor Customized Employment Grants

In October 2001, the Office of Disability Employment Policy (ODEP) at the U.S. Department of Labor began a grant initiative with the goal of building the capacity of local One-Stop Career Centers to develop and implement customized employment services to persons with disabilities. The first year of awards was for customized employment projects and in subsequent years the initiative has expanded to address additional populations including individuals with significant disabilities who are covered under the Olmstead Supreme Court decision and individuals with disabilities who are chronically homeless.

Customized Employment Projects

The Customized Employment Projects are strategic planning, demonstration, and systems change grants intended to improve the quality of employment outcomes for people with disabilities, resulting in competitive jobs, in integrated employment settings in the community, that provide career advancement and pay at least minimum wage. These projects achieve these outcomes through the provision of customized employment services delivered via the One-Stop delivery system. Customized employment services may include strategies such as job carving, self-employment, supported employment, job restructuring, providing natural supports, and other job development strategies that are individually determined and customized to the needs of the individual. Grants are awarded to local Workforce Investment Boards.

Grants Awarded

2001—\$4.4 million: Malden MA, Napa CA, Blaine MN, Knoxville TN, Marietta GA, Fairfax VA, San Diego CA

2002—\$5.4 million: Hempstead NY, Richmond VA, Kennewick WA, Montgomery AL, Detroit MI, El Paso TX, Indianapolis IN, Anchorage AK

2003—\$3.4 million: Chicago IL, Rockville MD, Utica NY, Flint MI, Helena MT

Olmstead WorkFORCE Action Grants

WorkFORCE grants are designed to support the coordination and delivery of employment opportunities for persons with disabilities who are interested in moving from institutional settings to independent living and competitive employment through utilization of customized strategies. Grant recipients are community-based organizations that work in conjunction with their local Workforce Investment Board and One-Stop Career Centers. The target groups to be served are people with disabilities who are either unemployed or underemployed and who are:

- In non-work, segregated work, or transitioning to work settings; Expected to be or are determined to be covered under the Olmstead decision and/or Executive Order; and therefore part of the state overall Olmstead planning process; or
- Awaiting employment service and supports following a move from a residential facility, or a part of a plan to move into a community under the Supreme Court decision in Olmstead and/or Olmstead Executive Order.

Grants Awarded

2002—\$1.9 million: Boston MA, Peoria IL, Decatur GA

2003—\$1.7 million: Fredrick MD, Nashville TN, Vancouver WA

**Department of Labor
Customized Employment Grants (cont.)**

Ending Chronic Homelessness through Employment and Housing Projects

The Office of Disability Employment Policy (ODEP) and its partners within DOL, the Veterans Employment and Training Service (VETS) and the Employment and Training Administration (ETA), in cooperation with the Department of Housing and Urban Development (HUD), funded projects to increase and improve employment opportunities for chronically homeless individuals with disabilities through a local partnership with HUD housing providers. The goal of the DOL cooperative agreements is to enable persons who are chronically homeless to achieve employment and self-sufficiency, thereby preventing unnecessary institutional placements. The DOL awards are supplemented by parallel HUD permanent housing grants. These demonstration grants will begin or expand the delivery and implementation of “customized employment” strategies for homeless individuals with disabilities so that they may live, work, and fully participate in their communities.

Grants Awarded

2003—\$3.1 million: Portland OR, Boston MA, San Francisco CA, Indianapolis IN, Los Angeles CA

Length of grants for all three Customized Employment Grant programs

Funding is for one year, and may be renewed annually for up to four years, depending upon the availability of grant funds and efficacy of grant activities.

Overall, training on these issues makes staff more knowledgeable about the issues and barriers people with disabilities face and the services that can be provided through the One-Stop Career Center, partner services, and community resources. Case studies of One-Stops that have made a serious commitment to providing various kinds of disability-related training suggest that these efforts result in staff no longer automatically referring customers to VR without stopping to consider whether the person wanted or needed VR services, and instead trying to provide services that are available within the One-Stop delivery system, including coordinating additional services from various community partners (Riley et al. 2004).

In conjunction with training, the development and use of assessment and training tools help staff identify job seekers with hidden disabilities. In addition, awareness and etiquette training can give staff a better understanding of hidden and undisclosed disability and can increase their ability to identify hidden and undisclosed disabilities during initial intake and assessment. In the ODEP customized employment sites, training appears to have significantly improved awareness and willingness to work with people with disabilities as evidenced by the increased number of people with disabilities coming to the One-Stop Career Centers as well as by the increased number of people with disabilities on WIA staff (Riley et al. 2004).

At least among One-Stop Career Centers that have received disability-related federal grants, considerable effort has been spent on improving programmatic accessibility. The majority

of WIG grants, for example, developed and used accessibility checklists and survey tools to evaluate both physical and program access barriers and taken steps to reduce/eliminate those barriers. Sites with customized employment grants conducted ongoing needs assessments through a variety of methods—focus groups, staff meetings and surveys, and interagency meetings (Riley et al. 2004). In some One-Stop Career Centers, VR is credited with playing an instrumental role in providing consultation on access issues that resulted in programmatic and physical modifications to increase access (Elliott et al. 2002).

In addition, the relatively recent issuance of the WIA Section 188 disability checklist in 2003 is a potentially valuable tool for increasing awareness of and guidance on meeting standards to ensure nondiscrimination and equal opportunity to persons with disabilities participating in programs and activities operated by local workforce investment boards that are part of the One-Stop delivery system.²⁵ The Checklist covers requirements applicable to local WIA boards regarding the operation of their programs and activities and includes descriptive examples of concrete actions that comply with some of the basic requirements imposed by Section 188 and the regulations. The Checklist also includes examples of policies, procedures, and other steps that One-Stop Centers can take to ensure that people with disabilities have equal programmatic and physical access to WIA Title I programs and activities. Some One-Stop Career Centers use the WIA Checklist as a tool for conducting accessibility assessments and are taking steps to improve physical and programmatic access. .

There are also benefits to infusing a disability lens into the general fabric of One-Stop operations. For example, it can encourage One-Stop staff to think more broadly about providing services to all customers of the One-Stop Career Centers, including those who are perceived as having a disability but nonetheless experience significant barriers to employment. Incorporating disability awareness and sensitivity training into regular One-Stop Career Center customer service training for staff also helps reinforce the idea that people with disabilities are just one of many different kinds of customers that One-Stop Career Centers are expected to serve. Integrating information about accommodations into One-Stop orientation sessions for customers

²⁵ The WIA Section 188 Disability Checklist provides the Department of Labor’s Civil Rights Center with a uniform procedure for measuring compliance with those provisions of Section 188 of WIA and the implementing regulations pertaining to persons with disabilities. The Checklist identifies the basic requirements under Section 188 of WIA, including references to regulations implementing Section 504 of the Rehabilitation Act; it can be accessed at www.dol.gov/oasam/programs/crc/section188.htm

can benefit those who may not want to disclose a disability or had not realized such services might be available (Fesko et al. 2003).

While One-Stop Career Centers have taken proactive measures to ensure physical and programmatic accessibility, how much progress has actually been made appears to vary not only by location, but also by who is making that judgment. An Internet survey of One-Stop operators and a survey of disability serving agencies suggest a sizable discrepancy between One-Stop operators' views about the extent to which centers are largely accessible and disability serving agencies' views. The One-Stop managers and operators who responded to a survey of One-Stop Career Centers (175 responses from 36 states, with a 16 percent response rate) in 2002 reported that their centers were largely accessible, with 94 percent reporting that their sites were physically accessible, 44 percent providing a fully accessible computer workstation, and 78 percent agreeing that their One-Stop Career Center has the technology available to allow people with disabilities to use computers and web sites (Storen et al. 2002).

However, in a survey of disability serving organizations conducted by the same organization, nearly three-quarters of respondents reported that the One-Stop system needs to improve physical and virtual accessibility. Only 17 percent of disability-serving agencies reported that One-Stop Career Centers were fully accessible. Twenty-six percent reported that One-Stop Career Centers were physically accessible, but that some services were not accessible, and 54 percent reported that some One-Stop Career Centers needed to become more physically or virtually accessible (Funaro and Dixon 2002).

Facilitating Collaboration between One-Stops and Disability-Serving Agencies

The degree to which VR and One-Stop Career Centers at the local level are able to effectively collaborate versus merely co-exist affects how people with disabilities will make use of the One-Stop system. A well developed partnership between VR and WIA allows for a broader but potentially more efficient distribution of resources and expertise whereby more severely disabled clients can benefit from VR services, less severely disabled can benefit from One-Stop services, or the services of each can be used in combination with one another (Hoff 2000).

Despite the philosophic, funding, and programmatic barriers to collaboration that exist between VR and WIA, there are examples at the local level that suggest that successful partnerships between VR and one-stops can occur. A case study of 12 One-Stop Career Centers

found that the following practices facilitated collaboration between One-Stop Career Centers and VR (as well as other partner agencies): ongoing joint orientation and training sessions and regularly scheduled meetings, e-mail networks, electronic listservs and publications, cross-partner teams and committees, standardized practices, common intake and application forms that standardize practices, and data sharing (Fesko et al. 2003).

Another mechanism for improving collaboration is physical colocation of staff and services. Although colocation is by no means a magic bullet, it does appear to provide a fruitful avenue for building closer collaborative relationships. The extent of colocation of One-Stop Career Centers and VR varies significantly, with some VR agencies running all their operations through the One-Stop Career Centers, while others have only one or two staff members at the One-Stop Centers on a part-time basis. Some benefits of full-time colocation of VR staff within the one-stop agency are that the close physical proximity encourages greater utilization and sharing of resources for the benefit of their clients (including equipment, services, and information), increased awareness between VR and One-Stop staff of each other's services, and more opportunity to collaborate on specific cases (Fesko, Cohen, and Timmons 2003).

Some case studies of One-Stop Career Centers noted that VR staff appeared to have greater input into and received more benefit from operational and administrative decisions of One-Stop managers when colocated in One-Stop Career Centers. Other One-Stop staff reported a greater awareness of VR program resources and procedures than in those instances where VR staff is located off-site or on a limited itinerant basis. Other advantages included the availability of a wider array of assistive technology at the One-Stop Career Center, more immediate access to VR personnel resources, and greater exposure for VR consumers to the range of services offered through the One-Stop Career Centers (Fesko et al. 2003; Elliott 2002).

The Navigator positions funded through WIG grants and the DPN demonstration initiative are another mechanism for facilitating closer partnership and collaboration between One-Stop Career Centers and VR. For example, over the first quarter of 2004, 54 of the DPNs ($n = 124$) reported significant activity with developing systems relationships with Vocational Rehabilitation Counselors (while 31 reported significant activity with limited outcomes). One hundred and eleven (111) Navigators reported that the group that sought their assistance the most to problem solve individual or systems collaboration issues was Vocational Rehabilitation Counselors (followed by the Mental Health Agency). While there was considerable interaction

between Navigators and Vocational Rehabilitation Counselors, the need for greater clarification between their respective roles was also noted by some DPN sites (Morris and Farah 2004).

In addition to establishing effective collaborative partnerships with VR, people with disabilities can be better served by the workforce development system if One-Stop Career Centers reach out to and establish partnerships with community-based disability organizations and other disability-serving organizations. One-Stop Career Centers that have made efforts to reduce physical and programmatic barriers to access and increase capacity to serve people with disabilities need to reach out to the disability-serving organizations in their communities to increase their knowledge of One-Stop services and promote referrals of people with disabilities who might benefit from these services.

Conducting outreach to this broader circle of agencies that works with people with disabilities is important, particularly because underutilization of One-Stop Career Centers by people with disabilities is attributable in part to negative perceptions sometimes held by disability-serving organizations of One-Stop Career Centers. Similar to VR, community-based disability organizations can also be instrumental in equipping One-Stop staff with the skills and resources they need to better serve people with disabilities. For example, they can help One-Stop Career Centers identify and address accessibility and accommodation issues, provide access to employers, and assist with marketing and outreach to the disability community (Fesko et al. 2003). The process evaluation of the Customized Employment grant sites also found that teaming arrangements with community providers gave clients access to available community resources that are not typically available at the One-Stop Center (e.g., clothing, housing assistance) but are needed forms of employment support (Riley et al. 2004).

One promising linkage to increase the capacity of One-Stop Career Centers to serve people with disabilities is interaction and coordination between One-Stop Career Centers and Benefits Planning, Assistance, and Outreach (BPAO) staff.²⁶ Returning to work for SSI and SSDI recipients raises complex benefits issues that One-Stop staff are not equipped to address. BPAOs can be colocated full-time or on a regularly scheduled basis. If this occurs, the number of individuals with disabilities who have contact with and use the One-Stop Center services likely will increase. In addition, BPAO staff working in a coordinated fashion with One-Stop staff can

²⁶ Authorized under the TTW legislation, SSA awarded 116 cooperative agreements to community based organizations to operate Benefits Planning Assistance, and Outreach (BPAO) projects. These projects, run through cooperative agreements with a variety of community-based organizations, provide all SSA beneficiaries with disabilities help with work incentives and assistance services.

address concerns and misinformation that an individual with disabilities is likely to have regarding how employment would affect benefits and health care coverage (Bader 2003).

Disability Navigator-type staff can also facilitate the link between One-Stops and BPAOs. For example, over the course of the January–March 2004 quarter of the DPN initiative, 102 Navigators reported that the greatest linkage they experienced with the SSA’s BPAO Program was through shared information, followed by training (88). Sixty Navigators reported that the BPAO had sought their assistance to problem solve individual or systems collaboration issues over the course of a quarter (Morris and Farah 2004). Several experts interviewed for this report noted that the potential partnership between One-Stop Career Centers and BPAOs constitutes an important collaboration that warrants further attention and development.

Finally, collaboration between One-Stops and other agencies can open the door for exploring ways to blend funding to increase the supply of services and training beyond those available through limited WIA funds as well as overcoming some of the constraints described earlier associated with ITAs for those with disabilities. Overall, blended funding is currently the exception rather than the rule. Blending resources from different funding streams and programs typically occurs on a case-by-case basis and requires a relatively high degree of coordination and collaboration on the part of staff from different programs; cross-program knowledge about potential options, rules, and constraints on use of funding; and motivation to think creatively about how to leverage resources in a coordinated fashion to address the needs of a particular customer.

Case studies conducted for the ODEP customized employment grant evaluation found examples of effective blending of resources to provide successful employment outcomes as a result of collaborative partnerships. For example, one site blended WIA ITAs for training opportunities, customized employment grant project funded ITAs to purchase additional resources, and VR funding to pay for on-the-job training (OJT) supports such as job coaching (Riley et al. 2004). Similarly, Bader (2003) found that blending resources was typically the only way a person with a disability was served through an ITA in the four One-Stop Career Centers examined in her study.

Because WIA’s application process for training typically takes less time than VR, an individual could apply for training through both programs, enter a training course supported through a WIA ITA, and then, once approved by VR, shift funding for continued participation in the training course over to VR or have VR pay for additional support services and assistive

technology. Another creative example of blended funding reported by Bader (2003) is the use of WIA ITA funds to pay for training up to the time limit in the local area and then use VR funding to extend the period in which training can be provided as needed. In the course of conducting this study, we did not uncover any examples of blended funding that included Ticket to Work funding, but it is worth exploring how TTW could be another potential source for expanding training opportunities through blended funding arrangements.

V. The Ticket to Work Program and the Workforce Investment Act

The Ticket to Work (TtW) program was established by the Ticket to Work and Work Incentives Improvements Act of 1999. Prior to implementation of TTW, federal funds to provide rehabilitation services to disabled beneficiaries went almost exclusively to state vocational rehabilitation agencies (VR), so the underlying concept was to unleash market forces to bring competition to the rehabilitation area.²⁷ Some observers hoped that TtW would offer new opportunities for the One-Stop Career Centers mandated by WIA to increase services to disabled beneficiaries. This section briefly describes the TtW program and its interaction to date with the WIA system.

Eligibility for TtW is based on several factors. Individuals must be SSI or SSDI beneficiaries between the ages of 18 and 64, and those with non-permanent disabilities must have been found to have either no improvement in their health or improvement that was insufficient to allow them to return to work. Participation in the program is completely voluntary. The Social Security Administration (SSA) mails eligible beneficiaries a “ticket,” and if the beneficiary is interested using the ticket, he or she then “assigns” the ticket to one of the eligible vendors or a consortium of vendors.

Organizations and consortia of organizations that wish to be eligible to participate in the program must enter into an agreement with SSA and be designated as an “employment network” (EN). An EN can be a single organization or a consortium of organizations. The state VR agency can be an EN by itself or in combination with other government, nonprofit, and for-profit organizations. Thus, local workforce investment boards, their agencies, and One-Stop Career Center operators can all serve as ENs. Once an EN has accepted a ticket, the beneficiary and EN

²⁷ Beginning in 1994, beneficiaries were permitted to use “alternate providers” for rehabilitation services, but the program was not used much, in part due to limited awareness. The alternate provider program is being phased out as TtW is implemented. For more information, see Gina Livermore et al., 2003, *Evaluation Design for the Ticket to Work Program: Preliminary Process Evaluation*, Falls Church, VA: The Lewin Group.

jointly develop an individual work plan (IWP). The IWP specifies services to be provided by the EN, the state VR agency, and other providers to help the beneficiary achieve employment.

Two types of payment schemes are available to ENs, an outcome payment system and an outcome-milestone payment system. Under the outcome payment system, the EN receives 40 percent of average SSI or SSDI benefits, depending on which program the beneficiary is enrolled in, for each month the beneficiary does not receive benefits due to employment. ENs can collect payments for up to 60 months, and the months need not be consecutive. The outcome-milestone method of payment permits an EN to receive payments for periods when the beneficiary meets certain employment and earnings requirements, referred to as milestones, and for periods when the beneficiary receives no SSI or SSDI benefits due to earnings, referred to as outcomes. The maximum that can be collected under the outcome-milestone system is 85 percent of the maximum for the outcome payment system.

The traditional VR reimbursement program, which has been in effect since 1981 and remains available to state VR agencies along with the reimbursement option, provides reimbursement from the Social Security Administration (SSA) to the state VR agency for beneficiaries who are referred to the VR agency by the state Disability Determination Service or who self-refer and who achieve substantial gainful activity (SGA) for nine consecutive months. Table 5 shows that between 6,000 and 11,000 individuals are rehabilitated each year, with an average cost of about \$12,000. The VR system serves many people with disabilities whose rehabilitation plans require a number of years to complete. The Council of State Administrators of Vocational Rehabilitation indicates that VR serves about 1.5 million clients per year, with 217,800 finding work each year.²⁸ Because payments under the traditional VR program are tied to earnings rather than cessation of benefits, the traditional program is less risky. Payments under the traditional program are limited to the cost of services, but under TtW it is possible for an EN to receive payments that greatly exceed the cost of services. Because VR agencies are the only organizations that can choose either the traditional VR payment system or the TtW system, many individuals interviewed for this project stated that the VR agencies have a significant advantage for participating in the TtW program over other ENs.

Barriers to Participating in the Ticket to Work Program. The Ticket to Work program has been phased in over several years. During the first phase of the program, which

²⁸ See www.rehabnetwork.org/investing_in_america.htm as of November 1, 2004.

began in February 2002, tickets were distributed in 13 states. In the second phase of the program, from November 2002 through September 2003, tickets were distributed in 20 states and the District of Columbia. In the third and final phase of the program, from November 2003 through September 2004, tickets were distributed in 17 states and five territories (Social Security Administration 2003).

Overall, the TtW program has gotten off to a slower start than had been hoped. As of August 2004, 9.5 million tickets had been issued to beneficiaries, but only 5,400 tickets have been assigned to ENs (Social Security Administration undated). In comparison, we estimated that about 2,400 exiters from WIA in 2002 may have been SSI beneficiaries

Another aspect of the program that has been somewhat disappointing is that the hoped for competition among potential providers has not occurred. By the end of 2003, 1,004 ENs enrolled, but only 386 ENs were serving beneficiaries (Social Security Administration 2004). In addition, most of the tickets have been assigned to state VR agencies—the Ticket to Work and Work Incentives Advisory Panel reports that over 90 percent of the beneficiaries have deposited their tickets with state VR agencies.

Several organizations have analyzed the implementation of TtW, and they have identified a number of barriers that have resulted in low levels of participation as ENs by organizations that are not state VR agencies. Many of the barriers are financial in nature—the payments that ENs can receive for successfully serving beneficiaries are neither great enough nor certain enough to justify participation—but other barriers exist as well.

Table 5: Reimbursement to State Vocational Rehabilitation Agencies and Alternate Providers

Fiscal Year*	Number of Claims Allowed	Amount of Dollars Allowed	Average Cost Per Claim
FY 03	6,760	\$84,599,189.87	\$12,514
FY 02	10,527	\$131,062,205.10	\$12,450
FY 01	8,208	\$103,892,717.86	\$12,657
FY 00	10,220	\$117,024,222.20	\$11,451
FY 99	11,126	\$119,934,831.23	\$10,780
FY 98	9,950	\$103,037,127.54	\$10,355
FY 97	8,337	\$89,200,347.05	\$10,699
FY 96	6,024	\$65,480,627.30	\$10,870
FY 95	6,238	\$72,733,912.87	\$11,660

Source: <http://www.ssa.gov/work/ServiceProviders/claimsprocessing.html> August 22, 2004.

In the preliminary evaluation of TtW implementation, Livermore et al. (2003) noted “A concern raised repeatedly by ENs was that the lack of any up-front funding for TtW limited their ability to participate in TtW. Many interviewees pointed out that they cannot afford to provide expensive screening and employment preparation services without any up-front financial support” (Livermore et al. 2003). The ENs also indicated that they would like to receive more information about the beneficiaries to improve their decisionmaking and reduce their costs in deciding whether to accept a ticket and that they believed that beneficiaries should receive better information about the TtW program to increase their participation.

The initial evaluation of TtW has reached similar conclusions (Thornton et al. 2004). The Mathematica Policy Research analysts interviewed eight ENs and concluded:

Fundamentally, to be successful, ENs must cover their costs. But all eight of the case study ENs despite their diversity on numerous characteristics, had one thing in common: they all were losing money on their TtW operations. It would be difficult to overestimate the seriousness of this matter for the future participation of these ENs—and possibly many others—in the TtW program. At the time of the fall 2003 interviews, 12 to 18 months after they started operating under TtW, the ENs’ situation looked rather bleak. (p. 106)

Financial problems described by the ENs most commonly related to the payment process, but concerns were also expressed about the payment structure for TtW. The payment process was viewed as overly burdensome and slow, and some ENs expressed concern about not being

able to recover any money unless the beneficiaries were able to earn sufficient wages to eliminate payments in a month. Other concerns expressed by the ENs in the study are similar to what was found in the Lewin Group study. ENs would like better information provided to both the beneficiaries and themselves, and they would like to see increased communication between the ENs and the TtW program manager and among the various ENs.

The Ticket to Work Advisory Panel has also concluded that there are major barriers to participating in TtW as an EN. The panel echoes the concerns expressed in the Mathematica Policy Research evaluation and conclude: “The most significant problem contributing to low EN participation is the payment system. We see this as the most urgent issue requiring attention” (Social Security Administration 2004). The Panel has recommended that Congress amend the payment schedule to increase potential payments, increase the size of payments, and accelerate the payment schedule.

The Panel also expressed some concerns with the policies and behavior of the Social Security Administration and the Rehabilitation Services Administration. Regarding the Social Security Administration, the Panel (2004, p. 8) states, “SSA has failed to market the Ticket Program to beneficiaries, most of whom remain confused about what a ticket is and why they might want to use it. The panel also believes that SSA has failed to engage enough ENs for the Ticket Program and has failed to support the ones that have enrolled.”

Regarding the state VR agencies, the Panel (2004, p. 17) concludes, “On balance, there has not been a productive integration or melding of the rehabilitative expertise of [state VR agencies] with the flexibility and community-based support services of ENs.” Specific concerns include the failure of VR agencies in some states to provide initial services to beneficiaries and the interpretation of the Vocational Rehabilitation Providers Handbook that permits states to assume under some circumstances that the beneficiary has selected the state VR agency as his or her EN without specifically selecting the VR agency as the EN.

Our interviews with a number of researchers, federal and state government staff, and interest groups confirm that all these concerns apply to state and local WIBs and One-Stop Career Centers. Some WIA organizations have been certified as ENS, and at least one state WIA agency is planning to become an EN, but overall, the WIA community has expressed the same concerns as the general EN community, particularly regarding issues on the payment system. In addition, some WIBs and One-Stop Career Centers have indicated that their charters do not permit them to assume the risks associated with the TtW contingent payments. Another

important factor, discussed below, is that the states and local WIBs are subject to performance standards, and the standards do not reflect the increased difficulties of serving customers with disabilities.

The National Center on Workforce and Disability (NCWD) has identified a number of options that One-Stop Career Centers and other WIA-related organizations can pursue in getting involved with the TTW program (Silverstein 2002).

- The One-Stop Career Center can become an employment network on its own.
- The local Workforce Investment Board can become an employment network.
- A One-Stop Career Center can become an employment network in partnership with other entities (e.g., state VR agency, state agency serving mentally retarded and developmentally disabled individuals, community organizations serving people with disabilities.)
- The One-Stop Career Center can partner with employment networks, and subcontract as a referral source or for other services.

VI. Conclusion

The Workforce Investment Act of 1998 was designed to provide a streamlined system of employment assistance that integrated many employment and training programs through a One-Stop delivery system for employers and job seekers, including job seekers with disabilities. As such, the One-Stop system offers the promise of providing people with disabilities a new source of employment and training assistance. Based on available WIA data, it appears that while people with disabilities are in fact making use of WIA services, such individuals comprise a small proportion (less than 10 percent) of the customers served and that the number of SSI and SSDI beneficiaries served is even less (under 2 percent).

The decentralized nature of the WIA system and the rich variation that characterizes One-Stop Career Centers make it risky to generalize about the extent to which One-Stop Career Centers across the country are responsive to the employment needs of people with disabilities or the extent to which lack of capacity and other barriers have prevented people with disabilities from making use of One-Stop services. Overall, it is recognized that the generic service delivery structure of the One-Stop system, existing WIA performance standards, insufficient access and accommodations, general lack of staff awareness and disability expertise, and lack of effective collaboration between One-Stop Centers and other disability-serving organizations can create

barriers to participation in the One-Stop system by people with disabilities. In addition, One-Stops have largely chosen not to become ENs under the Ticket to Work program.

To varying degrees, One-Stop Career Centers have made progress in addressing these barriers and improving the overall capacity of One-Stops to serve people with disabilities. Efforts to make One-Stop service delivery more accessible and responsive to the needs of people with disabilities is by no means limited just to One-Stop Career Centers that have benefited from the DOL and DOL-SSA specialized grant initiatives highlighted in the paper. At the same time, available studies on these initiatives plus discussions with state and federal government officials indicate that these targeted grants play an important role in building the capacity of grantees to better serve people with disabilities. In particular, the “disability navigator” offers a promising model for general capacity-building purposes, although it is not clear how well it can be replicated in the absence of funding dedicated to support such a position. The customized employment grants offer services that are typically beyond what the One-Stop Career Centers can provide with their WIA funds, so they give the One-Stops an important opportunity to augment their service mix.

A better understanding of the extent to which One-Stop Career Centers currently provide services to SSI and SSDI beneficiaries is severely hindered by data limitations associated with the current WIA reporting system. The ability to track services to SSI and SSDI beneficiaries in WIA programs would be greatly enhanced if the Department of Labor modified its reporting system to specifically note if individuals served are beneficiaries. Under the current reporting system, WIASRD, enrollment in neither program is specifically monitored, although SSI status is recorded along with several other welfare programs. The proposed reporting system, EMILE, currently records participation in both programs, but only for customers receiving intensive services or training; thus, people with disabilities who only receive core services would not be tracked under the Department of Labor’s current plan.

Four broader issues have important implications for the extent to which people with disabilities, particularly SSI and SSDI beneficiaries, will be served by One-Stop Career Centers. First, it is important to recognize that as currently structured, the potential for the One-Stop system to help those with the most significant barriers to work is through building strong partnerships with the VR system and other disability-serving organizations, such as the mental health agencies. With the exception of customized employment initiatives, most of the strategies discussed in this paper to improve one-stop service delivery to people with disabilities focus

more on ways in which capacity can be strengthened to better serve those with less severe disabilities.

Second, several aspects of the current WIA performance standards create a strong disincentive to serve those with disabilities, and especially those with more severe disabilities. If the WIA system is to be truly accessible to all customers who can benefit from services, performance standards need to be modified so that states and local WIBs are not penalized for serving people with disabilities.

Third, the Ticket to Work program, as currently configured, is unlikely to become a major source of expansion of services by One-Stop Career Centers to beneficiaries. For the most part this result is due to problems with the structure of the TtW program that discourage most potential providers from serving as ENs in the TtW program.

Finally, the emphasis on One-Stop Career Centers capacity to serve people with disabilities as well as efforts made by One-Stops across the country toward this end may in large part be eclipsed by larger disincentives experienced by SSI and SSDI beneficiaries to seek employment assistance and engage in employment due to fear of losing their program eligibility, Medicaid coverage, and other benefits.

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Appendix A

Selected List of Individuals Contacted for Background Information

U.S. Department of Labor, Office of Disability Employment Policy and Employment (ODEP) and Employment and Training Administration (ETA)

Alexandra Kielty, Chief, Division of Disability and Workforce Programs, ETA
Jim Downing, Policy Specialist, Division of Disability and Workforce Programs, ETA
Nathan Ainspan, Research Analyst, ODEP
Alicia Epstein, Youth Leadership Forum Program Manager, ODEP
Richard Horne, Supervisory Research Analyst, Office of Policy and Research, ODEP
Lisa Lahrman, Supervisory Program Specialist, Office of Operations, ODEP

U.S. Department of Education, Rehabilitation Services Administration

Jerry Elliott, Vocational Rehabilitation Program Specialist,
Charles Sadler, Vocational Rehabilitation Program Specialist

Social Security Administration, Office of Employment Support Programs

Jack Baumel, Deputy Office Director
Carol H. Brenner, Designated Federal Official for TtW Advisory Panel

State-level representatives

Jim Dorsey, E&T Grant Project Administrator, Vermont State Lead, Disability Program Navigator Initiative, Department of Employment and Training
Glenn Olsen, High Risk Population Specialist, Wisconsin Department of Workforce Excellence
Lisa Matrondola, Program Director of Disability Grants and Services, Massachusetts Department of Labor and Workforce Development
Doug Keast, Program Coordinator, Iowa Workforce Development
Dr. Robert Stensrud, Drake Rehabilitation Institute, Iowa
Barb McClannahan, Project Coordinator, Iowa Division of Vocational Rehabilitation
Norma Hohlfeld, Coordinator, Iowa Division of Vocational Rehabilitation
Becky Harker, Director, Iowa Governor's Developmental Disabilities Council
John TenPas, Department of Persons with Disabilities, Iowa Department of Human Rights

Academy of Educational Development

Larry Searcy, National Collaborative for Workforce and Disability/Youth,

Commission for Accreditation of Rehabilitation Facilities (CARF)

Paul Andrews, Director of Employment and Community Service programs
Renee Bibbee, Marketing and Research Coordinator

Cornell University Institute for Policy Research

David Stapleton, Director

Virginia Commonwealth University

Beth Bader, Research Associate, Rehabilitation Research and Training Center on Workplace Supports

Institute for Community Inclusion, University of Massachusetts Boston

Sheila Fesko, Project Coordinator, National Center on Workforce and Disability/Adult,
Allison Cohen, Research Associate, National Center on Workforce and Disability/Adult

National Disability Institute

Michael Morris, Director

Westat

William D. Frey, Associate Director, Health Studies, Westat.